REMARKS

Applicant gratefully acknowledges the courtesy of telephonic interview granted to the Applicant's representative, James Heintz, by Examiner England on November 6, 2006. During the interview, the Examiner suggested amending the claims to more distinctly point out the effect of the order of the stories. The Examiner indicated that a claim amendment directed toward displaying the stories in the order appears to distinguish over the art of record.

In this Amendment, Applicant amends claims 54 and 69 to correct an informality and to more particularly identify the significance of the "order" limitation. No new matter has been added and no change in the scope of the claims is intended. Support for the amendments can be found, for example, at page 3, lines 18-22; page 11, lines 9-12; page 34, line 22; page 35, line 5; page 60, line 3; page 61, line 9; and Fig. 5. Therefore, it is respectfully submitted that claims 54-82 are currently pending in this application. Reconsideration of this application is respectfully requested in view of the following remarks.

In item 3 on page 2 of the Office Action, claims 54-65, 67, 69-80 and 82 are rejected under 35 U.S.C § 103(a) as being unpatentable over Gauvin (U.S. Patent No. 5,991,760) in view of Paik et al. (U.S. Patent No. 6,185,584). In item 25 on page 7 of the Office Action, claims 66, 68 and 81 are rejected under 35 U.S.C § 103(a) as being unpatentable over Gauvin in view of Paik et al., and further in view of Hanson et al. (U.S. Patent No. 6,463,461). Applicant respectfully traverses these rejections.

Claim 54 specifically recites, among other novel features, **"receiving a message** from the feed station at the field station, **the message comprising at least one revision to the content list"** and **"implementing the revision to the content list** at the field station." (Emphasis

Added). It is respectfully submitted that Gauvin and Paik, either singly or in combination, fail to disclose, teach or suggest these features.

Instead, Gauvin discloses an autoupdate function that may be initiated when a downloaded web page is displayed on a client computer. See, for example, column 14, lines 55-57 of Gauvin. When initiated, a copy of the web page (update copy) is uploaded into the memory of the update server 1302 from the origin server 1300. See, for example, column 14, lines 57-60 of Gauvin. Column 14, lines 60-63 of Gauvin discloses that when the client computer 200 subsequently disconnects from the network 295, the update server 1302 periodically accesses the origin server 1300 to ascertain if the web page is different than the update copy by comparing the last update time of the update copy with the last update time of the web page on the origin server 1300. If the web page is different, **the update copy is modified to reflect the differences by directly <u>overwriting</u> the update copy with a copy of the (modified) web page**. See, column 14, line 66 through column 15, line 2 of Gauvin.

Therefore, Gauvin is directed to updating/modifying a web page by using an overwriting scheme, wherein an old version of a web page is overwritten in order to display a most recent version of the web page. It is respectfully submitted that this is in contrast to **"receiving a message from the feed station at the field station, the message comprising at least one revision to the content list"** and **"implementing the revision to the content list at the field station"** as specifically recited by Applicant in, for example, claim 54. In Gauvin, an overwriting scheme replaces an entire web page with an entirely new web page. In contrast, Applicant recites in claim 54, for example, "receiving a message ... the message comprising at least one revision" and then "implementing the revision", instead of merely overwriting an entire web page with an entirely new web page, as disclosed by Gauvin.

In item 9 on page 3 of the Office Action, the Examiner cites to sections of Paik that purport to teach implementing the revision to the content list at the field station. However, a review and evaluation of the cited sections and a complete review of Paik reveals that Paik fails to teach, disclose or suggest the specifics of Applicant's claimed invention. Instead, Paik is directed to **archiving** every version which is older than the version of the article associated with the article version identifier, wherein the archived versions of the article are placed into an archive file. See, for example, column 6, lines 15-19 of Paik. Further, Paik discloses his scheme being well suited to periodically automatically archiving all but the most recent version of the plurality of versions of the article. See also, for example, column 6, lines 35-39. Also, Paik discloses his scheme being well suited to automatically archiving all but the most recent version of the plurality of versions of the article when the plurality of versions of the article exceeds a predetermined quantity. See, for example, column 6, lines 39-40. In contrast to Paik's overarching goal of archiving, Applicant recites in claim 54, for example, **implementing the revision to the content list** at the field station. More specifically, Applicant specifically recites in claim 54, for example, **receiving a message** from the feed station at the field station, **the message comprising at least one revision to the content list"** and **"implementing the revision to the content list** at the field station." It is respectfully submitted that Gauvin and Paik, either singly or in combination, fail to teach these features.

Moreover, Paik discloses the Web as comprised of voluminous linked "sites" wherein various linked Web sites contain information of virtually innumerable type, style, and content. See, for example, column 1, lines 23-27. Column 1, lines 25-27 of Paik further discloses that web sites are often comprised of a plurality of Web documents referred to as Web pages. However, it is well known in the art that **web pages in a web site are not ordered in sequence,**

and a user can access a Web document via its allocated "Uniform Resource Locator" (URL) which is essentially an address path identifying the server which hosts the desired document plus the location of the document on the server. See also, column 1, lines 30-34. Thus, using a "browser" software, an end-user can send a request from a client computer to access a document stored at a particular URL. See also, for example, column 1, lines 34-36 of Paik. Nowhere does Paik disclose an ordered list of stories or displaying stories to an end user in accordance with the ordered list. Therefore, the concept of how the content list comprises a **plurality of stories and an ordered list of stories**, and wherein the **ordered list determines a sequence in which the stories will be displayed to a user,** as recited by Applicant in, for example, claim 54, is not disclosed, taught or suggested by Paik.

Furthermore, Applicant's respectfully submit that the combinations proposed in the Office Action of Gauvin and Paik are improper because the Examiner has failed to identify in the cited prior art any teaching, suggestion, or motivation to combine the references. "When an obviousness determination is based on multiple prior art references, there must be a showing of some teaching, suggestion, or reason to combine the references." Winner Intern. Royalty Corp. v. Wang, 202 F.3d 1340, 1348 (Fed. Cir. 2000). Applicant respectfully submits that the Examiner has identified no reasons in the prior art that teaches or suggests to a person skilled in the art to combine these references. Instead, Gauvin is directed to updating a web page by directly **overwriting** the update copy with a copy of the modified web page. See, column 14, line 66 through column 15, line 2 of Gauvin. In contrast, Paik is directed to **archiving** every version which is older than the version of the article associated with the article version identifier. See, for example, column 6, lines 15-19 of Paik. It is respectfully submitted that the combination of Gauvin and Paik are improper because overwriting a web page in order to modify such a web

page as taught by Gauvin teaches away from the concept of preserving old versions of an article by archiving as taught by Paik. Therefore, Gauvin and Paik deal with different problems and are from non-analogous fields. Applicant respectfully submits that there is no teaching, suggestion, or motivation in the prior art to combine the references.

Claim 69 specifically recites "the content list comprising a **plurality of stories and an ordered list of the stories, each story comprising at least text element, metadata**, and **zero or more references to a media object**" and "**end user stations being configured to ... display the stories in accordance with the ordered list.**" (Emphasis Added). It is respectfully submitted that Gauvin and Paik, either singly or in combination, fail to teach or suggest these features for at least the similar reasons explained above. Further, none of the references cited in the Office Action teach these features.
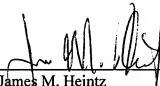
For at least these reasons, Applicant respectfully submits that claims 54 and 69, along with the remaining dependent claims, define patentable subject matter.

CONCLUSION

In light of the above, Applicant submits that this application is now in condition for allowance and therefore request favorable consideration. If any issues remain which the Examiner feels may be best resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact Applicants counsel, James M. Heintz at 202.861.4167.

Respectfully submitted,

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